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**Pro hac vice motions forthcoming*

Additional counsel on next page.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

JANE DOE #1; JANE DOE #2; NORLAN
FLORES, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

Jeh Johnson, Secretary, United States
Department of Homeland Security, in his
official capacity; R. Gil Kerlikowske,
Commissioner, United States Customs &
Border Protection, in his official capacity;
Michael J. Fisher, Chief of the United States
Border Patrol, in his official capacity; Jeffrey
Self, Commander, Arizona Joint Field
Command, in his official capacity; Manuel
Padilla, Jr., Chief Patrol Agent-Tucson Sector,
in his official capacity,

Defendant.

Case No.

**DECLARATION OF
JAMES DUFF LYALL IN
SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS
CERTIFICATION**

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**Admitted pursuant to Ariz. Sup. Ct. R. 38(f)

**DECLARATION OF JAMES DUFF LYALL IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

I, JAMES DUFF LYALL, hereby declare:

1. I am a Staff Attorney at the American Civil Liberties Union Foundation of Arizona ("ACLU-AZ"), and co-lead counsel for Plaintiffs in this litigation. I make this declaration in support of Plaintiff's Motion for Class Certification. If called as a witness, I would and could competently testify to the facts stated herein, all of which are within my personal knowledge.

2. I received a J.D. degree from Georgetown University Law Center in 2007. I am an attorney at law admitted to practice before the District of Arizona. I was admitted to the State Bar of California in 2008 and to the Arizona State Bar in 2011.

3. Beginning in 2014, I have directed, participated, and assisted in the collection of the declarations of individuals formerly detained in CBP custody in Border Patrol's Tucson Sector. The vast majority of those declarations were taken in southern Arizona or Sonora, Mexico shortly after the individuals were released or transferred from CBP custody, and usually within hours or days of release or transfer.

4. In July 2014, along with co-counsel in this litigation, I visited individuals recently detained by CBP in Tucson Sector who were at that time incarcerated in a privately-run federal prison in Florence, Arizona.

5. In advance of that visit, I obtained the names of the incarcerated individuals from the daily Operation Streamline calendar, posted each weekday on the Arizona District Court's website, and arranged for visitation at the Florence facility following the Operation Streamline hearing.

6. Along with co-counsel, I met with several individuals and took declarations regarding their recent experiences in CBP custody.

7. In December 2014, along with co-counsel, I conducted a second series of meetings with individuals detained in the same facility, following the same procedures as previously.

1 8. Additionally, from approximately December 2014 to April 2015, I directed
2 ACLU staff in collecting declarations and directly participated in the collection of
3 declarations from individuals released by CBP to Alitas House, a local halfway house for
4 families recently detained in CBP custody in Tucson Sector.

5 9. In March 2015, I visited and collected declarations from detainees in a
6 privately-run ICE immigration detention facility in Eloy, Arizona, regarding their recent
7 experiences in CBP custody.

8 10. In November 2014, I traveled to Sonora, Mexico where I visited and took
9 declarations from individuals recently repatriated to Nogales, Sonora, Mexico regarding
10 their recent experiences in CBP custody.

11 11. A true and correct copy of each of the following declarations of individuals
12 formerly detained by CBP in a Tucson Sector facility are attached:

- 13 • Declaration of Pablo Lopez Ruiz, as **Exhibit 1**;
- 14 • Declaration of Julio Jimenez Tucum, as **Exhibit 2**;
- 15 • Declaration of Adrian Tapia Rascon, as **Exhibit 3**;
- 16 • Declaration of Aurelio Ignacio Morales-Soto, as **Exhibit 4**;
- 17 • Declaration of Anselma Angela Ambrosio Diaz, as **Exhibit 5**;
- 18 • Declaration of Fernando Munguilla Erasno, as **Exhibit 6**;
- 19 • Declaration of Juan Jesus Padron Rios, as **Exhibit 7**;
- 20 • Declaration of Guadalupe Felipe Gaspar, as **Exhibit 8**;
- 21 • Declaration of Maria de Jesus Lopez Magdaleno, as **Exhibit 9**;
- 22 • Declaration of Julio Celso Chavez Ortiz, as **Exhibit 10**;
- 23 • Declaration of Jose Buelna Camacho, as **Exhibit 11**;
- 24 • Declaration of Jose Cruz Ruvalcaba Martinez, as **Exhibit 12**;
- 25 • Declaration of Brenda Chilel Lopez, as **Exhibit 13**;
- 26 • Declaration of Mario Roberto Zamora Diaz, as **Exhibit 14**;
- 27 • Declaration of Dolores Gonzalez Martin, as **Exhibit 15**;
- 28 • Declaration of Maria Ordonez Ortiz, as **Exhibit 16**;

- Declaration of Jose Luis Vergara Jimenez, as **Exhibit 17**;
- Declaration of Luis Alberto Franco-Cruz, as **Exhibit 18**;
- Declaration of Odilia Velasquez Vasquez, as **Exhibit 19**;
- Declaration of Victor Hugo Rosas Garcia, as **Exhibit 20**;
- Declaration of Valdemar Perez Perez, as **Exhibit 21**;
- Declaration of Araceli Castro Vasquez, as **Exhibit 22**;
- Declaration of Maria Lorena Lopez Lopez, as **Exhibit 23**;
- Declaration of Francisco Chay Quinones, as **Exhibit 24**;
- Declaration of Veronica Rodriguez Alvarado, as **Exhibit 25**;
- Declaration of Domitila Gomez Bartolom, as **Exhibit 26**;
- Declaration of Jose Garcia Rodriguez, as **Exhibit 27**;
- Declaration of Soledad Hernandez Yescas, as **Exhibit 28**;
- Declaration of Nelvia Mazoriegos Morales, as **Exhibit 29**;
- Declaration of Maura Velasquez Hernandez, as **Exhibit 30**;
- Declaration of Cecilio Medina Valencia, as **Exhibit 31**;
- Declaration of Celiflora Rodriguez Juarez, as **Exhibit 32**;
- Declaration of Nasario Gonzalez Peleaz, as **Exhibit 33**;
- Declaration of Angel Hernandez Reyes, as **Exhibit 34**;
- Declaration of Flora Elizabeth Gonzalez Gomez, as **Exhibit 35**;
- Declaration of Irma Veronica Lima Galicia, as **Exhibit 36**;
- Declaration of Yuri Perez Lopez, as **Exhibit 37**;
- Declaration of Sequen-Tesen Reyes Ovidio, as **Exhibit 38**;
- Declaration of Adriana Trujillo Hernandez, as **Exhibit 39**;
- Declaration of Luis Carlos Valladares Martinez, as **Exhibit 40**;
- Declaration of Adrian Vasquez Morales, as **Exhibit 41**;
- Declaration of Judith Soledad Morales Perez, as **Exhibit 42**;
- Declaration of Jesus Alfredo Mesa Barbosa, as **Exhibit 43**;
- Declaration of Reginalda Lopez Gomez, as **Exhibit 44**;

- Declaration of Juan Reyes Martinez, as **Exhibit 45**;
- Declaration of Gustavo Huerta Saenz, as **Exhibit 46**;
- Declaration of Jessica Margarito Catarino, as **Exhibit 47**;
- Declaration of Roberto Vargas Martinez, as **Exhibit 48**;
- Declaration of Hugo Emilio Cuy Solis, as **Exhibit 49**;
- Declaration of Cesar Vergara Jimenez, as **Exhibit 50**.

12. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 8th day of June, 2015.

By: /s/ James Duff Lyall

James Lyall